



# FLAIR WRITING INDUSTRIES LIMITED

## HUMAN RIGHTS POLICY

### 1. Introduction

Flair Writing Industries Limited (“**Flair**” or “**the Company**”) is committed to conducting its business in a manner that respects, protects and promotes internationally recognized human rights standards.

As a manufacturer of writing instruments and related products, the Company recognizes that its operations involve employees, contract workers, suppliers, distributors and communities. The Company acknowledges its responsibility to ensure that all its business activities are carried out in a manner that upholds the dignity, equality, safety and fundamental rights of individuals.

This Policy reflects the Company’s commitment to uphold:

- The Constitution of India
- Applicable labour, employment and industrial laws
- The principles of the United Nations Universal Declaration of Human Rights (UDHR)
- The UN Guiding Principles on Business and Human Rights (UNGPs)
- International Labour Organization (ILO) Core Conventions
- Applicable SEBI (LODR) Regulations and BRSR requirements

The Company is committed to embedding human rights considerations into its business strategy, risk management processes and operational practices.

The Policy was approved by the Board of Directors of the Company at its meeting held on May 21, 2026 and shall be effective with immediate effect.

### 2. Scope & Applicability

This Policy applies to:

- The Board of Directors;
- All employees (permanent, temporary, contractual, trainees and apprentices);
- Workers at manufacturing facilities;
- Subsidiaries and step-down subsidiaries;
- Suppliers, vendors, contractors and other business partners, to the extent applicable to their engagement with the Company.

The Company expects its suppliers and business partners to adhere to similar human rights standards and comply with applicable labour and human rights laws. Where



feasible, contractual clauses, supplier declarations and assessments may be used to reinforce these expectations.

### **3. Governance & Oversight**

The overall oversight of this Policy shall rest with the Board of Directors and/or the designated Committee of the Board.

Senior Management shall be responsible for implementation of the Policy across operations.

The Human Resources Department shall:

- Monitor adherence to this Policy;
- Ensure necessary training and awareness programs;
- Review human rights-related grievances;
- Report material matters to the Board/Committee, where required.

Human rights considerations shall be integrated into the Company's Enterprise Risk Management framework.

### **4. Our Commitment**

Flair Writing Industries Limited commits to:

- Respecting and promoting human rights in all operations;
- Providing a safe, healthy and inclusive workplace;
- Preventing human rights violations within its business and supply chain;
- Promoting equality, dignity and non-discrimination;
- Encouraging ethical and responsible conduct among employees and business partners;
- Providing accessible grievance redressal mechanisms;
- Continuously improving human rights performance through monitoring and review.

### **5. Key Human Rights Principles**

#### **5.1 Non-Discrimination & Equal Opportunity**

The Company prohibits discrimination based on:

- Gender
- Religion
- Caste
- Race
- Ethnicity



- Age
- Disability
- Sexual orientation
- Marital status
- Nationality or any other legally protected characteristic

Employment decisions, including recruitment, compensation, promotion, training and termination, shall be based on merit, qualifications, performance and business requirements.

## **5.2 Dignity, Respect & Prevention of Harassment**

The Company maintains a zero-tolerance approach towards:

- Sexual harassment
- Workplace bullying
- Verbal or physical abuse
- Intimidation or coercion

The Company has constituted an Internal Committee under the Prevention of Sexual Harassment of Women at Workplace (Prevention, Prohibition and Redressal) Act, 2013 (“POSH Act”).

The POSH Committee:

- Addresses complaints of sexual harassment;
- Conducts fair and impartial investigations;
- Ensures confidentiality and protection of complainants;
- Recommends appropriate corrective actions.

All employees are expected to uphold a respectful and professional work environment.

## **5.3 Forced Labour & Child Labour**

Flair strictly prohibits:

- Forced labour
- Bonded labour
- Compulsory labour
- Child labour

The Company complies with applicable child labour laws and ensures that no person below the legally permissible age is employed.

Suppliers and contractors are expected to follow the same standards.



## **5.4 Safe & Healthy Workplace**

The Company is committed to:

- Providing safe and hygienic working conditions;
- Complying with occupational health and safety regulations;
- Identifying and mitigating workplace hazards;
- Conducting periodic safety training;
- Ensuring emergency preparedness at manufacturing facilities.

Health and safety risks shall be proactively assessed and managed.

## **5.5 Fair Wages & Working Hours**

The Company shall:

- Comply with minimum wage laws;
- Ensure fair and timely payment of wages;
- Adhere to statutory limits on working hours and overtime;
- Provide statutory benefits as required under applicable laws.

## **5.6 Diversity, Inclusion & Equal Opportunity**

Flair promotes a culture of diversity and inclusion and encourages:

- Gender diversity in the workforce;
- Equal opportunity in recruitment and promotion;
- Fair and transparent appraisal systems.

## **5.7 Community & Local Impact**

The Company recognizes its responsibility towards communities surrounding its operations and shall:

- Operate in a manner that minimizes adverse impact on local communities;
- Engage responsibly in CSR initiatives;
- Avoid activities that may infringe upon community rights.

## **5.8 Responsible Supply Chain**

The Company expects suppliers and contractors to:

- Comply with labour laws and human rights standards;
- Prohibit child labour and forced labour;
- Maintain safe working conditions;
- Avoid discriminatory practices.



The Company may conduct assessments or seek declarations to ensure compliance.

## **6. Governance & Implementation**

- The Board of Directors shall have overall oversight of this Policy.
- Senior management shall ensure implementation across operations.
- Human Resources Department shall monitor adherence.
- Training and awareness programs shall be conducted periodically.
- Human rights considerations shall be integrated into risk management processes.

## **7. Grievance Redressal**

Employees and stakeholders may raise concerns through:

- Internal HR grievance channels;
- The POSH Internal Committee;
- The Whistleblower / Vigil Mechanism.

All complaints shall be handled in a fair, impartial, confidential and timely manner.

## **8. Training & Awareness**

The Company shall conduct periodic training and awareness programs to:

- Educate employees on human rights principles;
- Promote respectful workplace conduct;
- Strengthen understanding of grievance mechanisms;
- Reinforce compliance obligations.

## **8. Non-Retaliation**

The Company prohibits retaliation against any individual who raises a human rights concern in good faith.

## **9. Review & Disclosure**

- This Policy shall be approved by the Board of Directors.
- It shall be reviewed periodically and updated as necessary.
- The Company may disclose relevant information in its Annual Report, BRSR or Sustainability Report, as applicable.



## **10. Disciplinary Action**

Violation of this Policy may result in disciplinary action in accordance with Company procedures and applicable laws.

## **11. Disclaimer**

**The Company may review, amend, or update this Policy from time to time to reflect changes in laws, regulations or business practices**